

REMARKS

The Office Action dated July 11, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1 and 3-31 are currently pending in the subject application, including independent claims 1, 24, and 29-31. In particular, Applicants herein amended claims 1, 24, and 29-31 to more clearly and distinctly claim the subject matter that the Applicants regard as the present invention. It is respectfully submitted that the amendments add no new subject matter to the present application and serve only to place the present application in better condition for examination. It is believed that all grounds for rejection in the Office Action are currently addressed and that the present application is currently in condition for allowance in view of the amendment and the following comments. Claims 1 and 3-31 are respectfully presented for consideration.

Claims 1 and 3-31 were rejected under 35 U.S.C. §103(a) as being allegedly obvious in view of U.S. Patent No. 7,072,329 (Willars) in view of U.S. Patent No 6,728,261 (Sasson). Referring, for example to claim 1, the Office Action took the position that Willars disclosed all of the recited limitations except for conveying transport-related information between entities in the asynchronous transfer mode and the internet protocol transport networks for controlling the transport bearers in the transport network layer, but that this deficiency is allegedly cured by Sasson. However, as

described below, the combination of Willars and Sasson fails to disclose each and every limitation recited in any of the pending claims.

Independent claim 1, from which claims 3-23 depend, relates to a method including linking an inter-working function with an asynchronous transfer mode transport network and an internet protocol transport network and configuring an inter-working function, linked with an asynchronous transfer mode transport network and an internet protocol transport network to use a user defined information element of an existing protocol. The existing protocol is used to establish data transport bearers in the asynchronous transfer mode transport network to adapt a new protocol for controlling the transport bearers in a transport network layer. Then, transport-related information is conveyed between entities in the asynchronous transfer mode and internet protocol transport networks for controlling the transport bearers in the transport network layer.

Independent claim 24, from which claims 25-28 depend, relates to an apparatus comprising an inter-working function linked with an asynchronous transfer mode transport network and an internet protocol transport network. The inter-working function includes a mapping entity that is configured to use a user defined information element of an existing protocol, that is used for establishing data transport bearers in the asynchronous transfer mode transport network to adapt a new protocol for controlling the transport bearers in a transport network layer. The mapping entity is further configured to convey transport-related information between entities in the asynchronous transfer

mode and internet protocol transport networks for controlling the transport bearers in the transport network layer.

Independent claim 29 relates to an apparatus that includes controlling means for controlling an inter-working function linked with an asynchronous transfer mode transport network and an internet protocol transport network. The apparatus also includes mapping means for using a user defined information element of an existing protocol for establishing data transport bearers in the asynchronous transfer mode transport network to adapt a new protocol for controlling the transport bearers in a transport network layer. The apparatus also includes conveying means for conveying transport-related information between entities in the asynchronous transfer mode and internet protocol transport networks for controlling the transport bearers in the transport network layer.

Independent claim 30 relates to a computer readable medium having computer executable instructions for implementing a method. The method includes configuring an inter-working function linked with an asynchronous transfer mode transport network and an internet protocol transport network to use a user defined information element of an existing protocol. The existing protocol is used to establish data transport bearers in the asynchronous transfer mode transport network to adapt a new protocol for controlling the transport bearers in a transport network layer. Then, transport-related information is conveyed between entities in the asynchronous transfer mode and internet protocol transport networks for controlling the transport bearers in the transport network layer.

Independent claim 31 relates to an apparatus that includes a controller to control an inter-working function linked with an asynchronous transfer mode transport network and an internet protocol transport network. The apparatus also includes a mapper to use a user defined information element of an existing protocol for establishing data transport bearers to adapt a new protocol for controlling the transport bearers in the asynchronous transfer mode transport network in a transport network layer. The apparatus also includes a conveyer to convey transport-related information between entities in the asynchronous transfer mode and internet protocol transport networks for controlling the transport bearers in the transport network layer.

As acknowledged in the Office Action and as described in the prior submitted Response of October 16, 2007, Willars does not disclose every limitation of any of the claims.

As described in FIG. 2A-2C and at Col. 8, line 3, to Col. 19, line 39, Willars generally relates to a multi-layer telecommunications system which includes an application layer and a transport layer. Differing transport technologies are interworked without terminating the application layer signaling or without involving a technology inter-working in the control plane of the application layer (e.g., without interworking in the application signaling). For example, the application layer may be a radio network layer of a wireless telecommunications system. A transport layer interworking function may be situated on an interface between two nodes of the radio access network (RAN).

The interworking function can be located in a separate node which may be a node having both ATM and internet protocol (IP) interfaces.

In particular, in Figure 9B, Willars discloses using a Served User Transport (SUT) information element between an inter-working function and an ATM node (RNC) in order to deliver the IP-address of an IP node to the inter-working function. Willars fails to teach or suggest using the SUT between the IP node and the inter-working function.

In this way, Willars discloses using a Served User Transport (SUT) information element between an inter-working function and an ATM node (RNC) in order to deliver the IP address of an IP node to the inter-working function (Fig. 9b). Willars fails to teach or suggest using the SUT between the IP node and the inter-working function.

Claim 1 recites, in part, that a user-defined information element is used to convey transport-related information between entities in ATM and IP transport networks for controlling the transport bearers in the Transport Network Layer. Furthermore, the data transport bearers are used in the ATM transport network. Willars does not disclose at least these recited elements of claim 1. In particular, as described above, Willars discloses that the SUT information element may be used between an inter-working function and an ATM node (RNC), but fails to teach or suggest using the SUT between the IP node and the inter-working function.

Therefore, claim 1 is allowable over Willars. Likewise independent claims 24 and 29-31 and the related dependent claims 3-23 and 25-28, although patentably distinct from claim 1, are allowable over Willars on similar basis. To address this admitted deficiency

in Willars, the Office Action cited to Sasson, but as described below, the combination of Willars and Sasson fails to disclose each and every limitation recited in any of the pending claims.

Sasson generally relates to implementing interworking function (IWF) between ATM and IP protocols and networks. The interworking function in Sasson provides mapping and encapsulation functions necessary to ensure service provided to networks/protocols is unchanged. An ATM service specific convergence sublayer (ATM-SSCS) translates between the ATM layer and RTP/UDP/IP sublayer.

However, as described above in the discussion of Willars, claim 1 recites that the data transport bearers are in the ATM transport network. As described above, Sasson also does not teach or suggest the use of data transport bears in a ATM transport network. In contrast the Office Action cited to Sasson at FIG. 2 and related specification at col. 3, ll. 34-50, which described that an interworking function in Sasson is placed at the ATM source **before** connection with the destination IP network (see also Fig. 2). Therefore, the disclosure in Sasson cannot discloses or suggest use of a data transport bearers in a ATM transport network.

Applicants further note that the recited embodiment of claim 1 therefore provides significant technical benefits over Willars and Sasson individually or in combination. For example, as described in the present specification, certain embodiments of the present application enable a user-defined information element of ALCAP to be also used also in the IP network.

Therefore, claim 1 is allowable over Willars and Sasson. Withdrawal of this rejection of claim 1 and reconsideration of this claim in view of the arguments are respectfully requested. Likewise, claims 3-23 depend from claim 1 and should be allowable over Willars and Sasson on similar grounds.

Independent claims 24 and 29-31, although different in scope from claim 1, contains similar recitations related to conveying transport-related information between entities in ATM and IP transport networks for controlling the transport bearers in the ATM network in the Transport Network Layer. Thus, there independent claims are also allowable over Willars and Sasson. Claims 25-28 depend from claim 24 and should be also allowable over Willars and Sasson on similar grounds.

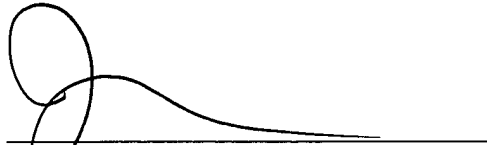
In summary, the combination of Willars and Sasson does not disclose each and every recited element of the claims 1 and 3-31, and this rejection is clearly improper and should be withdrawn. In view of the arguments presented herein, reconsideration and allowance of claims 1 and 3-31 are respectfully requested.

As discussed above, each of the pending claims 1 and 3-31, including independent claims 1, 24, and 29-31, recites subject matter which is neither disclosed nor suggested in the cited references. Applicants submit that the recited subject matter is more than sufficient to render the invention non-obvious to a person of ordinary skill in the art. It is respectfully requested that independent claims 1, 24, and 29-31 and their related dependent claims be allowed in view of the above comments and that the present application be allowed to pass to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large loop followed by a long, sweeping horizontal stroke.

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